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State Bar No: 04324

**Attorney for** Zachary Arthur Kakar

**UNITED STATES DISTRICT COURT**

**DISTRICT OF ARIZONA**

**United States of America,**

Plaintiff,

v.

**ZACHARY ARTHUR KAKAR,**

Defendant.

) **NO. 20-mj-00301-N/A-LAB**

) **ADDENDUM MOTION TO**  
) **RECONSIDER DETENTION AND**  
) **RELEASE CONDITIONS**

It is expected that excludable delay under Title 18, United States Code, Section §3161(h)(1)(F) will not occur as a result of this motion or an order based thereon.

Defense counsel has today filed a waiver of the standard Presentence Report and set a change of plea in this matter. However, on several occasions, Mr. Kakar has requested that he be allowed to go to treatment. It is requested that on Tuesday, April 14, 2020, that this Court allow Mr. Kakar to be screened for residential treatment and reset the change of plea.

**RESPECTFULLY REQUESTED** this 7th day of April, 2020.

***Law Offices of Thomas Higgins, PLLC***

/S/ THOMAS E. HIGGINS

THOMAS E. HIGGINS

Attorney for Zachary Arthur Kakar

1 Original filed via  
2 CM/ECF this date above to:

3 Clerk's Office  
4 United States District Court - Tucson

5 Copies via CM/ECF to:

6 Christine Melton  
7 Assistant United States Attorney  
8 United States Attorney's Office - Tucson  
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